

Attorney Docket No. INPA.221

REMARKS

Claims 1, 3-30 and 32 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 6,219,697 ("Lawande").

Claims 2, 14, 31 and 33-46 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Lawande in view of U.S. patent no. 5,978,854 ("Fujimori").

Applicant respectfully traverses the rejection in view of the amendment because the cited references do not disclose or suggest every element of any pending claim.

Independent claims 1, 13, 27, 33, and 40 each recite the use of an address that is a guaranteed unique identifier (GUID). The Office action admits that Lawande fails to disclose this limitation, and then states that the use of a GUID would be obvious because 1) Lawande states that protocols other than the ones described may also be used, and 2) the use of GUIDs is well known. Applicant respectfully maintains that the use of a GUID in the claimed invention would not be obvious, and that these two reasons do not provide sufficient motivation to combine for the following reasons:

1) Although Lawande states that protocols other than the ones he describes may be used, a GUID is not a protocol – it is a hardwired, universally unique address. Various protocols may be used to access an address, such as a GUID, but the address itself is not a protocol, and this statement of Lawande is inapplicable to the obviousness of using a GUID.

2) The fact that some uses of a GUID are widely known in the industry does not make a prima facie case that the use of a GUID in a particular new application would be obvious. Most patentable inventions are made up of known elements used in new ways or in

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new combinations. Applicant maintains that in view of the crowded art in this field, if the use of a GUID in this particular application was obvious as of the priority date of the application, there will be a suitable reference describing it's use in this particular application. Lawande alone, or the combination of Lawande and Fujimori, do not provide this description.

Claims 2-12, 14-26, 28-32, 34-39, and 41-46 depend from claims 1, 13, 27, 33, and 40, respectively, and therefore also contain the same limitations not disclosed or suggested by the cited references.

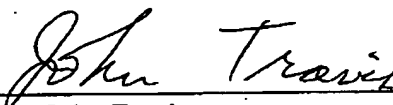
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Conclusion

For the foregoing reasons, Applicant submits that the application is now in condition for allowance, and indication of allowance by the Examiner is respectfully requested. If the Examiner has any questions concerning this application, he or she is requested to telephone the undersigned at the telephone number shown below as soon as possible. If any fee deficiency or overpayment is detected, please charge any insufficiency or credit any overpayment to Deposit Account No. 02-2666.

Respectfully submitted,

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